

INTERNAL REVENUE SERVICE

Department of the Treasury

Date: JAN 24 1997

Form Number:

990

In Reply Refer To:

Person to Contact:

Telephone Number:

Periods Ended:

Gentlemen:

We have examined your organizations activities and returns, Form 990, for the tax years ended

The examination found that your organization consists of members who are owners of buildings in a shopping center known as the . Copies of your organizations articles of incorporation and bylaws were not available during the examination. However, minutes of the board and correspondence indicate that payment of membership dues to your organization is required by the covenants and restrictions on the property.

Your organization provides for the common maintenance and security of the shopping center including the exterior of buildings, the parking lot, lighting in the parking lot, and gardening in the common areas.

Revenue Ruling 73-411, 1973-2 CB 180 provides that a shopping center whose membership is restricted and required is directed to promoting that particular business interest and does not qualify as a business league or chamber of commerce under section 501(c)(6) of the Code. This revenue ruling is effective for all tax years after December 31, 1973.

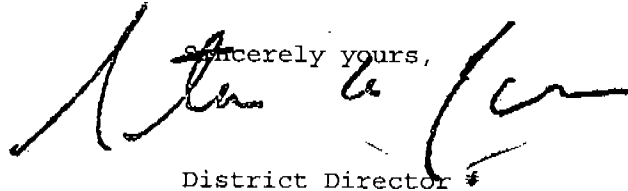
The examination found that your organization has a restricted and required membership. The purpose is to promote the and the business within the shopping center. Therefore, your organization does not qualify for exemption under section 501(c)(6) of the Code.

Your organization agreed to the revocation of exempt status by signing Form 6018 on . Accordingly, the letter recognizing your exemption from tax under section 501(c)(6) of the Code is hereby terminated effective . The appropriate officials of the State of are being notified of this final determination in accordance with the provisions of section 6104(c) of the Code.

Your organization has filed Forms 1120-H for the tax years ended _____ and _____. A review of Internal Revenue Code section 528 found that it applies only to residential condominium property. The Forms 1120-H which you filed for the tax years ended _____ and _____ are being accepted. However, your organization will be required to file Form 1120 in subsequent tax years.

Thank you for your cooperation.

Sincerely yours,

A handwritten signature in dark ink, appearing to be "John A. [unclear]", written over the typed name "John A. [unclear]".

District Director #